

### DELAWARE NUTRIENT MANAGEMENT

DDA

2320 S. DuPont Highway Dover, DE 19901 1-800-282-8685 (DE Only) (302) 698-4500

Website: <a href="www.state.de.us/deptagri">www.state.de.us/deptagri</a> Email: <a href="mailto:nutrient.management@state.de.us">nutrient.management@state.de.us</a> Fax: (302) 697-6287

# The Delaware Nutrient Management Commission Program & Education Minutes of the Meeting Held March 14, 2006

#### **In Attendance:**

Committee Members Present	Others Present
C. Solberg, Technology Chair	M. Brown
T. Keen	M. Adkins
C. Larimore	B. Schilling
Ex-officios Present	S. Hollenbeck
W. Rohrer, Jr.	P. Sample
	H. Monck
	L. B. Malone

This meeting was properly notified and posted as required by law.

#### Call to Order/Welcome:

C. Solberg called the meeting to order at 5:00 p.m. and welcomed everyone in attendance.

#### **Approval of Minutes:**

C. Solberg noted the minutes requiring approval are the Program and Education Subcommittee meetings which were held on October 6, 2005 and November 1, 2005 and the combined Budget and Program & Education Subcommittee which was held on December 13, 2005.

#### T. Keen motioned to approve the minutes. C. Larimore seconded the motion with passed unanimously.

#### **Discussion and Action Items:**

Discuss Continuing Education Credit Criteria:

- C. Solberg stated the principle discussion item this evening is to look at the overall Continuing Education Program per the consensus of the Full Commission. The most salient comments discussed at the Full Commission meeting were:
  - 1) C. Larimore shared her concern because certification holders are confused as it relates to continuing education credits (CEUs). Specifically if CEUs are bankable beyond the time period of the individual's expiration or if they are not.
  - 2) There appears to be a sense the continuing education classes that a certification holder attends is not specifically relevant to their level of certification.
  - 3) During the Full Commission meeting M. Cooke told everyone as a lawyer she is required to take continuing education. She receives a letter detailing her professional credentials and certification. This letter indicates exactly what is required of her and the specific date continuing education must be

- recorded by and approved. C. Larimore agreed such a letter would be appropriate for the Nutrient Management Certification Program. She further stated CEUs should be in the appropriate commodity for the certification holder.
- 4) D. Baker commented it was useful for a Nutrient Generators to learn what happens to the manure they produce after it leaves their operation. Hence, appropriate related education about water quality and the fate of litter would be appropriate.
- C. Solberg noted the Program and Education Subcommittee was charged with providing a report to the Full Commission by April concerning the Nutrient Management Certification Program and CEUs.
- B. Rohrer referred to the table, *Approved Continuing Education Program* (attached to minutes). This table outlines continuing education opportunities for 2004, 2005 and 2006. B. Rohrer noted in 2005, a total of 34 classes were approved. He further noted since 2006, 33 classes have been approved. Four additional classes are scheduled through April. The table provides the sponsor, title of the class, number of credits that were offered and how many individuals took each class and received CEUs. The title alone gives a good indication as to the attendees of each class; turf, poultry or traditional agriculture.
- B. Rohrer referred to the letter (attached to minutes) which the staff of Nutrient Management mails in December. This letter accompanies a newsletter which outlines the schedule of classes that are offered. It is mailed in December because the bulk of classes are offered in January and February.

Information is inserted into the letter from the certification database which is indicated by the parenthesis. Inserted is the level of certification, certification number, the date of certification expiration, number of CEUs required and the number of CEUs on file. C. Solberg asked if this standard mailing has been in place for the last three years. B. Rohrer reported this is the second year the letter has been sent.

- T. Keen asked if the table is the only place where a certification holder can receive CEUs. B. Rohrer reported the table lists CEUs which were approved. He further noted anyone can submit for CEU approval.
- B. Rohrer referred to the flyer from the extension office (attached to minutes) dated March 13, 2006. This flyer is mailed to remind individuals of upcoming classes.
- B. Rohrer reported there is a process in place, Delaware Nutrient Management Program Continuing Education (attached to minutes) for submitting for CEUs for approval. The process is based on the Certified Crop Advisor's (CCA) Program. One CEU is issued for 50 minutes; they are broken down into one-quarter credit increments. S. Riggi of the Research and Education Center issues CEUs which works well and is appropriate due to their involvement. B. Rohrer noted he works closely with her. In accordance with the regulations, the Program Administrator identifies CEUs. This is clearly a legal role and therefore he is involved in the process.
- C. Solberg asked when the Nutrient Management Competency Areas (attached to minutes) was assembled. B. Rohrer stated the process was established for Nutrient Consultants. It is advertised and provided to the Consultants to ensure they study the appropriate general areas so they can pass the exam. C. Solberg asked if the Nutrient Management Competency Areas and Delaware Nutrient Management Program Continuing Education documents were a compilation of practical policy, memorandums and the judgment of the Nutrient Management Staff working with the University of Delaware. B. Rohrer answered yes.
- B. Rohrer noted the certification database is designed to issue individual certification holders CEUs which expire after three years. The certification database only allows issuance of CEUs for a period of three-years and therefore, they are not permitted to be extend into the fourth, fifth, etc. years. This has caused some issues for the staff as when a call is received the certification holder may have enough CEUs, but at the time of expiration they may drop off. This is due to the fact of the technical structure of the certification database.

B. Rohrer reported no guidance is given to certification holders with respect to relevance of the topic of each class. The only guidance given is the competency areas.

Discussion ensued concerning the particulars of the letter sent by the staff to certification holders and the table of approved CEUs.

It was noted certified individuals at times do not complete the sign in sheet for attendance. It was agreed this does happen and the staff is instructed to talk to the individual about the content of the class based on the agenda. The reason some individuals do not sign the attendance sheet is they are concerned they will start to receive junk mail. This would not be the case.

- C. Solberg noted there are an estimated 50 CEUs opportunities afforded to a certification holder to obtain since December 2005. B. Rohrer noted the letter was mailed to all certification holders in mid-December.
- B. Rohrer reported estimates for individual expiration as follows:
  - 1) 900 with an expiration of May 1, 2006
  - 2) 900 with an expiration of May 1, 2007
  - 3) 500 with an expiration of May 1, 2008
- C. Larimore noted certification holders are under the impression they must obtain their CEUs every year instead of every three years. B. Rohrer noticed this. C. Larimore stated this may lead to the issue of taking any class whether it is appropriate to their commodity or not.
- C. Solberg stated the Approved Continuing Education Program table represents a good diversity of classes. It appears relevance of class is a choice a certification holder is making. C. Solberg asked if this was a separate problem and if there is a need to encourage individual to be trained in an appropriate category or define what would be considered an appropriate category. C. Solberg noted there is ample time and classes to make a good choice.
- C. Larimore stated education is a good thing and something can be learned no matter what type of class an individual attends. She further stated there would be more interest if it was something they could use.
- C. Larimore stated the class in Harrington was well attended as certification holders were scrambling to obtain their CEUs. They were under the impression they needed to get their CEUs as soon as possible. B. Rohrer reiterated the letter indicated their expiration date.
- C. Solberg suggested having the letter indicate how many years or months an individual has to obtain their CEUs. This would allow individuals to recognize their expiration date. B. Schilling noted the letter already states the expiration date. M. Adkins stated the font could be changed to make it stand out.
- B. Schilling asked if the classes could specify what type of CEU a class offers or would this make things too complicated. B. Rohrer noted that one credit is acceptable for any level of certification; the hope is they attend something relative to them.
- B. Rohrer noted the title of the class should indicate what the class is about. B. Schilling stated you cannot stop an individual from attending what class they want to attend. C. Solberg agreed.
- C. Solberg stated it is important to assure each certification holder knows what timeframe he/she has to acquire their CEUs. He further stated many diverse opportunities of CEUs have been afforded.

The other issue that needs to be made clear is the fact that CEUs are not permitted to be carried over. B. Rohrer stated bolding the expiration date in the letter would be the best way to go and easiest to accomplish. B.

Rohrer's raised his concern over having individual letters as it would require different programs to accomplish. It would become more difficult to disseminate the letter. C. Solberg noted a suggestion is easy to make, but there is a practical side to the suggestion also. Discussion ensued in reference to the content of a class and what an attendee may look for.

- B. Rohrer reported he would be attending and speaking at the Poultry Production and Nutrient Management classes on April 6<sup>th</sup> and 19<sup>th</sup>. C. Larimore asked if they were different classes or one class running two times. B. Rohrer answered they were the same.
- B. Rohrer reported he attended and spoke at the Nutrient Management Meeting on February 23<sup>rd</sup>. This class was presented by Hudson Consulting. C. Solberg asked B. Rohrer if he had any feedback. B. Rohrer stated he had received some feedback, some of which was very general. T. Keen asked if this class was self serving. B. Rohrer stated N. Hudson spoke for approximately five minutes and summarized his services. There was an additional four speakers making a presentation. The speakers were B. Rohrer, D. Hansen, C. Whalen and J. Timmons. B. Rohrer stated N. Hudson asked him before the meeting if it was okay for him to speak and he informed him he was.
- C. Solberg stated there is no way to mandate a better common sense as to what CEUs an individual obtains. M. Adkins stated the only thing that could be done would be identify what level of certification the courses are designed for. B. Schilling stated the level of certification a class would be more appropriate for could be identified. C. Solberg asked if this could be done. He also asked if something could be added to the letter where the Commission encourages taking appropriate classes. B. Rohrer stated this could be done, but must be careful not to discourage anyone from taking a class.

The attracting point of the class in Harrington was the fact that seven CEUs were offered. Many individuals looked at it from the aspect they could attend for one day and would have enough CEUs to renew. It was noted it would be more beneficial to individuals if classes were offered as a half day sessions, especially those with animals.

C. Solberg stated the ability should never be offered to obtain a three-year CEU requirement in one day. This individual will be lost over the next two and a half years. This would be a shame. C. Solberg stated finding ways to avoid this is important.

It was noted the most education is obtained from two or three credit courses. This would be best for the individual as well. B. Schilling stated he is required to have 40 CEUs and cannot get 30 CEUs in one year. This keeps the individual going every year.

- C. Solberg stated another way to accomplish this would be looking at how this works for M. Cooke. This is a fixed number of CEUs per year. C. Larimore stated is may need to be two credits per year. C. Solberg would like one class every year for three years. This would allow 12 months to figure out where they want to take the class and the topic. C. Solberg stated this should be a policy. C. Larimore stated the individual could take as many credits a year as they would like to, CEU would not be available for anything over the annual need.
- M. Brown stated the class in Harrington resulted in a lot of good conversations. He also stated that it was great to have that many attending
- B. Rohrer asked C. Solberg if he was recommending limiting participation. C. Solberg stated his recommendation is to spread CEUs over the years. B. Rohrer stated they should be allowed to obtain their CEUs credit any way they can. C. Solberg understood, but noted this was the Administrators point of view. This needs to meet the spirit of the law not the administrative necessity.

- C. Larimore noted some individuals attend workshops because they are interested and there are those who attend because they have to. She further stated there is no real answer to this. M. Adkins stated if it was limited to two or three at a time should be sufficient.
- B. Rohrer stated the focus needed to be obtaining the minimum standards. There should be a focus on shortfalls.
- T. Keen stated the subcommittee is addressing the wrong concern because the largest loop hole in the Nutrient Management Program is cost share for planning. He expressed his concern that individuals could take advantage of the program. T. Keen offered the following example:

If an individual signed up a 2,000 acre account at \$5.00 an acre it would equate to \$10,000. It would only take two days to pull the soil samples, two days to write the original plan, and one day each to update the plan. This would mean it was six days of work and the individual would receive \$10,000. The only out of pocket expense would be for gas and equipment. Sampling would cost \$750 through the University of Delaware. There would be about a \$7,000 or \$8,000 profit.

- T. Keen stated that consultants need to do follow up in the fields on the plans they write during the growing season. C. Solberg noted the Sierra Club made this argument when minimum standards for the plan were created. C. Solberg stated agrees, but noted this was a separate subject. He did state that payments should be minimums.
- T. Keen stated the more diversified the operation is the more time necessary to write a plan. If an operation is 3,000 acres, only grows soybean and corn and only uses startup, it does not take long to write a plan.
- B. Rohrer noted that changes were implemented to the reimbursement rates about two to three years ago. He put in a lot of work with C. Robinson going over some rates and presented them to the Commission. They broke the numbers different ways; the size of the operation, flat rate with a per diem for animal feeding operations. They came up with the figures through conversation with USDA, conversation with consultants and many other ways. The federal governments cost is about \$1.50 an acre and the program is similar.
- B. Rohrer noted that some individual had taken advantage of the program, but did catch a few of them. There is room for efficiency.
- T. Keen reiterated there are loop holes in the cost share program. He noted for the type of analytical work his firm has done it costs between \$1.75 and \$2.00 to have the soil sample results. The sampling they do is much more extension than what is required. B. Rohrer noted once the base plan is completed the cost to update the plan will decrease. T. Keen stated cost share should be modified to require that a specified number of visits to the farm must be completed.
- C. Solberg noted he suggested in the past there should be performance obligations and it was not supported. T. Keen stated this is not an agenda item and would like for it to be brought back to the Program and Education Subcommittee.
- C. Solberg welcomed to open this up to a formal discussion because performance standards for professional regulations are a common practice. This would ensure individuals are held to a standard and would level the playing field to assure they are paid more fairly. C. Solberg asked if the subcommittee would like to place this on the agenda for next month. B. Schilling stated this needed to be discussed a lot further and understood T. Keen's position. T. Keen stated one issue that would arise would be that it would require more policing by the staff of the Nutrient Management Program and the staff is short handed as it is.

- C. Solberg noted the subcommittee should not analyze the use of a policy change with nutrient management planning and performance standards without first determining the usefulness. Therefore, it should be placed on the agenda. Discussion ensued concerning nutrient management planning and performance. C. Solberg stated if everyone is in agreement it would be kept as a running secondary item to be placed on the next agenda. T. Keen asked B. Rohrer if there was a concern that certification holders are not maintaining the continuing education requirement. B. Rohrer stated this is not known yet. He further stated there are individuals that do not have any credits as of yet or that he is aware of.
- C. Solberg asked if there were any other comments about the continuing education competency or the letter in reference to the appropriateness and the matrix of continuing education. T. Keen asked if the table of continuing education is sent with the letter. B. Rohrer stated no, but something similar is sent, a newsletter
- B. Rohrer stated the newsletter was blue and it listed classes scheduled for January and February. The letter and newsletter goes to all certification holders. T. Keen stated the newsletter was very thorough.
- C. Solberg stated the subcommittee needs to be committed in finding ways to eliminate excuses. The other thing that would occur would be to make the certification holder to take more time make their choices.
- T. Keen asked when the newsletter went out and B. Rohrer stated it was mailed in December. T. Keen asked if this is when recertification began. B. Rohrer stated no, but several classes are scheduled in January, February and March. T. Keen asked if everyone's certification was due the same time each year. For the three year certification expiration is May 1 and for the Consultants, which is one year, the expiration is December 31. As an annual certification the consultant needs to be proactive.
- T. Keen's major concern is to communicate what is required to the certification holder. C. Larimore does not understand why they do not pay attention. C. Solberg stated it appears an assessment of the continuing education program may be too early as we wanted to get through the first full round of successful recertification. Basically, the subcommittee may need to wait a few more months to look at the entire program. He noted the subcommittee is obligated to report to the Full Commission in April.

Speaking as a participant of the program, M. Brown stated the Nutrient Management Continuing Education Program is cut and dry. He further stated there is an excellent menu of available courses. M. Brown stated the Commission is doing a great job and does not see the need to revamp it.

- C. Larimore stated the program will always have trouble. M. Brown stated everyone will get used to the program requirements.
- C. Solberg asked what the curriculum for Problems in New Developments is. It is not known at this time.

Discuss On-Farm Assessment and Environmental Review Program

- B. Rohrer referred to the On-Farm Assessment and Environmental Review (OFAER) document (attached to minutes). He noted this topic was discussed briefly at the last Full Commission meeting, but wanted to share the report with the subcommittee to provide additional detail.
- B. Rohrer stated the OFAER is an assessment of farms, free, voluntary, confidential and comprehensive. Initially it was designed for swine operations, but has expanded to all animal feeding operations.

Shortly after the program was initiated, B. Rohrer was approached about the OFAER, but did not pursue it due to the other priorities the Commission was working on at the time. Now may be a good time because Allen's participated in the program this year and the poultry companies are seriously considering adopting it for all their

contract growers or at least recommending it to them. If they adopt the OFAER, it could be a joint venture as it would be a benefit.

The OFAER would fit into the program as a voluntary way of assessing the farm to prove there is no discharge. Currently, there is a requirement or liability to assure farms do not have a discharge. If there is a discharge there could be a violation of Concentrated Animal Feeding Operation (CAFO) no matter what the size of the operation. This would be a good way to incorporate a federal program to allow an operation to assess the farm to determine if there is a discharge.

- B. Rohrer reported there currently a total of 79 Assessors who are independent. They are not from the region and called in from other areas. They trained 600 individuals through the training program. Of the 79, 61 are Beef and Dairy Assessors and 53 are Poultry Assessors.
- B. Rohrer outlined the OFAER report:
  - 109 requests received for the 2005 period
  - 220 assessments completed in 18 states
- C. Solberg asked how the Program Administrator sees the OFAER would fit into the Nutrient Management Program. B. Rohrer was thinking about Animal Feeding Operations (AFOs) and CAFOs where the Nutrient Management Program is obligated through state and federal regulations to prioritized large AFOs to assure that there is not a runoff or problem on the farm. Currently, there is only one way to accomplish this and that is through the audit process.
- T. Keen asked what the Nutrient Management plan had to do with a discharge. B. Rohrer stated it was compliance with the State program. Ultimately, a plan does not state there is a discharge. B. Rohrer did not want to get into the definition of a discharge, but the Commission in general defines a discharge as improper storage of manure. The Federal regulations identify a discharge as applying manure at a rate above and beyond what is recommended in the Nutrient Management plan.
- B. Schilling asked if the operator stated there was not a discharge would there be an obligation to visit the operation to verify it. B. Schilling as where the obligation started and where it ended. B. Rohrer stated the obligation lies within the Nutrient Management Program, that there is a good faith effort nutrients are handled properly. B. Rohrer stated meeting in the past, EPA is in general focused on other operations as far as how the State determines if there is a discharge or not. B. Rohrer could see the OFAER utilized as a way to show the obligation has been met.
- T. Keen asked if farmers in Delaware have already participated in the program. B. Rohrer referred to page 9 which outlines 22 audits of which all were poultry farmers. M. Adkins asked if B. Rohrer had seen any of the audits. B. Rohrer stated he has seen a general form, but has not seen anything complete.
- T. Keen asked if the 22 farms were audited, is there somewhere the Commission could go to identify them. B. Rohrer stated all of Allen growers participated and would probably be half. After speaking with T. Brinson many fair recommendations were made and nothing was major.
- B. Schilling saw the participation as a plus if the audit was clean. It looks good.
- B. Rohrer stated it was something to consider. There is about \$5 Mil a year going towards the assessment. Funding primarily goes towards training the assessor and their time devoted to the assessment. It takes about half a day to do the audit. Some things they look at while on the farm are odor, dust and manure management environmental assessment. It is funded by the Clean Water Act (CWA) and if there is a violation it will be

brought to the foreground. B. Rohrer raised the question since it is funded by CWA what obligation is there to report a clear violation to enforcement and was told there is an obligation which has only been done one time.

- C. Solberg asked how many large AFOs there are in Delaware. B. Rohrer stated there are about 35-40 large AFOs in Delaware. C. Solberg asked what the obligation of the Nutrient Management Program had in assuring there is not a discharge. B. Rohrer stated this was up to the Commission to make policy decisions. Currently the regulations state large AFOs need to be in full compliance with State Nutrient Management Program (SNMP) by January 2006 and may not demonstrate a discharge. The regulations also state if the operation is larger than 8 animal units it cannot demonstrate a discharge without a permit.
- T. Keen asked if an operation in Delaware was in compliance with the regulations what would be the need of participating in the on-farm assessment. B. Rohrer stated if the operation was a large AFO there would be two choices: (1) a visit from the SNMP or (2) the on-farm assessment.
- T. Keen stated he would much rather have the SNMP audit an operation than someone affiliated with EPA. B. Rohrer noted that most all are affiliated with EPA in some way and stated the assessors have no affiliation with EPA. Most of the assessors are retirees or private consultants.
- C. Solberg asked how B. Rohrer's envisioned how this program would work with the SNMP. B. Rohrer stated there is a list of large AFOs. No communication has been made with any of the AFOs as of yet. Communication has been made by the poultry companies. C. Larimore asked what would be considered large AFO. B. Rohrer stated a large AFO is larger than 125,000 capacity.

The priority is to audit the AFO. B. Rohrer would have liked to audit large AFOs this year, but found it more of a priority to audit operations that have had complaints. Only one AFO has been audited.

In answer to C. Solberg's question the SNMP needs to communicate with the large AFOs and assure they are in compliance with the State program. They will be placed on an audit list. The new individual in the SNMP will be charged with this responsibility. The large AFO will be given a choice of either a Nutrient Management audit or OFAER assessment. This would be implemented in tandem with the poultry companies as they will proceed with recommending the on-Farm assessment.

- B. Rohrer stated the OFAER would help with the workload of the SNMP and would also help the appearance of the program. T. Keen stated if he was an operator in the State of Delaware he would not opt to enter into the program. B. Rohrer noted 22 operations already have.
- C. Larimore stated there are some operators that would prefer having someone they know or local do an audit than a stranger. This sounds good, but if something is found they can bring in regulators. This will stop individuals from participating. T. Keen stated the SNMP would work with the operator in order to resolve any issue they may have, but with the OFAER assessor they will report back to EPA. B. Rohrer noted if an issue arises that needs resolving the OFAER assessor is obligated to contact the state agency which would be the SNMP.
- C. Solberg asked if the Commission authorized the administrative staff to invite the OFAER assessors to perform diligence on our behalf it could be structured so OFAER reports back to the SNMP. B. Rohrer stated that this is how he understood it. B. Rohrer stated this would not be done on our behalf but rather an option and if anything is questionable the SNMP would need to do an audit. There are individuals taking advantage of the OFAER and was trying to prevent the duplicate the assessment of a farm.
- C. Solberg asked if B. Rohrer was suggesting the OFAER. B. Rohrer stated it would be offered as an option as it would contradict the program since it is voluntary. B. Schilling asked if it were offered as an option, how the SNMP would be aware the outcome. B. Rohrer stated the operator would provide proof the on-farm assessment

- was done. B. Schilling asked if this would be enough to know what is occurring on the farm. B. Rohrer stated it would not, but it would be a good indication.
- T. Keen does not understand if the OFAER is voluntary and it comes back through the SNMP why the 22 that participated are not known. B. Rohrer stated because it is confidential and noted out of several hundred of assessments that were done, only once did they have to notify the state regulatory office.
- B. Rohrer stated it is a good idea and resource. He further stated it would behoove the Commission to be by their side.
- T. Keen asked who headed up the program and suggested bringing someone to the meeting to address the program. B. Rohrer stated R. Savage does and could be invited.
- C. Solberg stated it would be appropriate to bring to the Commission so they are familiar with the program. It will be only offered as an option with no adverse consequences and would provide new information. In accordance to the report, C. Solberg noted OFAER is a pollution/prevention and education program and a one-on-one education opportunity. The challenge areas noted even though it is high risk do not equate to violations of state and federal laws. They will be viewed as opportunities as identify measures to avoid to avoid these situations.
- Per C. Solberg, the Program and Education will not make a recommendation. Instead, R. Savage can attend a Full Commission meeting. B. Rohrer will try and get someone to a Full Commission meeting and will do so only if it would be something the subcommittee is seriously considering.
- T. Keen asked if the poultry companies have endorsed the program. B. Rohrer stated not yet and wanted to speak with their grown out individuals. R. Savage presented the program in Maryland at a meeting and in attendance were B. Rohrer, two from Maryland Department of Agriculture (MDA), 1 from Maryland Department of Environment (MDE), three representatives from the poultry companies and B. Satterfield. The purpose of the meeting is because Maryland is adopting Delaware's Commercial Processors Annual Report, the assessment and a couple of other topics.
- M. Adkins stated if the poultry companies present the assessment then the Commission needs to be part of it also. C. Solberg stated there is a difference between making something optional and offering it as a program. He further stated the program has always offered options and should not exclude this one.
- C. Solberg stated there is no consensus on the OFAER. B. Rohrer stated this would be okay and allow the poultry companies the lead. M. Adkins stated we should not let them take the lead, but rather work with them. C. Solberg then stated it would have to be offered as an option.
- B. Schilling stated there is no feedback from the audit that has been done and therefore, has no clue on the operation. B. Rohrer stated this is not necessarily true as we may not have the details, but it would be a confident indicator there are not violations.
- T. Keen stated his position is waiting on the poultry companies to endorse the program. B. Rohrer reiterated that Allen's has completed the assessment
- C. Solberg asked B. Rohrer to follow up on continuing education, the poultry companies use and recommendation of OFAER and the cost share issue.
- B. Rohrer noted that 10% of the large AFO audits would be done if this program is accepted since Allen's has about five operations that fall in the 125,000 capacity.

### **Public Comments:**

NONE

## **Next Meeting:**

The next meeting of the Program and Education Subcommittee meeting was scheduled for March 23, 2006 at 6:30 p.m.

### **Adjournment:**

Chairman Solberg adjourned the meeting at 7:35 p.m.

Approved,

Carl Solberg, Chair Program & Education Subcommittee

BRR/mrp